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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA, :
 : PLAINTIFF'S FIRST SET
 : OF INTERROGATORIES AND
 - v - : REQUEST FOR PRODUCTION
 : DOCUMENTS TO CLAIMANT
 \$42,000.00 IN FUNDS FORMERLY : GUILLERMO CONCEPCION
 HELD AT WESTCHESTER BMW IN THE :
 NAME OF ELVIN CONCEPCION, : 07 Civ. 8326 (RPP)
 AND ANY AND ALL PROPERTY TRACEABLE :
 THERETO, :
 :
 Defendant-in-rem. :
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PLEASE TAKE NOTICE that the United States of America, by its attorney, Michael J. Garcia, United States Attorney for the Southern District of New York, pursuant to Rules 26, 33 and 34 of the Federal Rules of Civil Procedure and Rules 26.3 and 33.3 of the Local Rules for the United States District Courts for the Southern and Eastern Districts of New York, hereby requests that you answer the following written interrogatories and produce the requested documents. These interrogatories are to be answered separately, in writing, under oath, within thirty days of this date. These interrogatories are addressed to you as a claimant in this action and your answers must be based upon all of the information known to you, your attorney or any representative.

PLEASE TAKE FURTHER NOTICE that each interrogatory and each

subpart of each interrogatory shall be accorded a separate answer. Each answer shall first set forth verbatim the interrogatory to which it is responsive. Pursuant to Rule 26(e) of the Federal Rules of Civil Procedure, these interrogatories are to be regarded as continuing in character and you are requested to provide by way of supplementary answers such additional information as may hereafter be obtained by you or any person on your behalf which will augment or otherwise modify any answer now given. Such supplementary answers are to be filed and served upon the United States within thirty days after receipt of such information but not later than the time of trial.

INSTRUCTIONS

(a) Whenever there is a request to describe a document, set forth: (1) its date and place of execution; (2) its authors and/or signatories; (3) its title, if any; (4) the type of document; (5) its subject matter and substance; (6) its addressee(s) and all other persons receiving copies; and (7) its location.

(b) Whenever there is a request to identify a person, set forth: (1) his or her full name; (2) his or her present or last known home and business address and home and business telephone number; (3) his or her present employer and position; and (4) the nature of his or her knowledge or information.

DEFINITIONS

Pursuant to Local Civil Rule 26.3, the full text of the rules of construction and definition set forth in paragraphs (c) and (d) of Local Civil Rule 26.3 is deemed incorporated by reference into this discovery request. However, for the purpose of these interrogatories and this request for production of documents the following definitions should be used:

(a) The term "you" or "your" means any agent, representative or person acting on behalf of Guillermo Concepcion.

(b) The term "the Defendant Funds" refers to the \$42,000 in funds which were formerly held at Westchester BMW in the name of Elvin Concepcion and which are the subject of this action.

(c) The term "the Vehicle" refers to the Spider Ferrari that was provided, on or about April 5, 2007, to Westchester BMW, and which was later sold and the proceeds of which are the Defendant Funds.

(d) The terms "relevant to," "relating to" and "relationship" mean any connection whatsoever, direct or indirect.

INTERROGATORIES

1. Identify your name (as well as any aliases), addresses, telephone number(s) (including cellular phone numbers), and social security number.

2. Identify all individual(s) with an alleged interest in the Vehicle and the Defendant Funds.

3. Identify all individual(s) that used or had custody of the Vehicle from the time you allegedly acquired an interest in the Vehicle up until the time it was delivered to Weschester BMW. For each individual, identify the time period during which the individual used or had custody of the Vehicle.

4. Identify each individual with information that the Vehicle was not (1) property involved in a money laundering transaction or attempted money laundering transaction, and (2) was not purchased with monies furnished in exchange for a controlled substance, proceeds traceable to such an exchange, or monies used or intended to be used to facilitate such an exchange.

5. Identify each individual involved in the interactions with Weschester BMW relating to the Vehicle, including but not limited to individuals involved in discussions with Weschester BMW about the sale of the Vehicle.

6. Identify each individual with knowledge or information relevant to the subject matter of this action, including, but not limited to, all persons whom you intend to call

as witnesses at trial (and so identify them) if this action goes to trial. For each individual, identify the subject(s) of information about which he or she has knowledge.

7. Identify all of your present and former employers, since 2000. For each employer, state the employer's name, phone number, and address, as well as the name of your supervisor(s), the time period of your employment, your job title and the nature of the work you performed, and your salary.

8. Identify all of your sources of income (e.g., stipends, annuities), other than those already listed in Interrogatory 7 above, since 2000.

9. Identify any and all property (including money, jewelry, real estate, artworks, stocks, and bonds), worth more than \$5,000, in which you have, or had, an ownership interest or which you control, or controlled, including properties held in the name(s) of other individuals or entities, such as a spouse, since 2000. Include the value of the property, the date on which it was acquired, and the current whereabouts of the property. Include properties outside the United States.

10. Identify all vehicles in which you have had an ownership interest (including those that have been registered to you), since 2000. For each vehicle, identify the date of purchase, the amount, the source of funds use to acquire the vehicle, and the individual(s) that used the vehicle after you acquired it.

11. Identify all real properties in which you have had an ownership interest, since 2000. For each real property, identify the date of purchase, the amount of consideration paid, the source of funds used to acquire the residence, and the individual(s) that occupied the residence after you acquired it.

12. Identify each individual with knowledge concerning the drug trafficking activities of Elvin Concepcion, Jose Concepcion and Angel Dominguez.

13. Identify all current and former employees of J&M Trucking (a/k/a J&M Import-Export) since 2000. For each employee, identify the dates of employment and position.

14. Identify all current and former employees of A-M Professional Services since 2000. For each employee, identify the dates of employment and position.

15. Identify all current and former employees of GMC Professional Services since 2000. For each employee, identify the dates of employment and position.

16. Identify all current and former employees, since 2000, of any other entities that you currently own or control, or that you owned or controlled at any time from 2000 through the present. For each employee, identify the dates of employment and position.

17. Identify your gross income for each year since 2000.

REQUEST FOR DOCUMENTS

PLEASE TAKE NOTICE that the United States of America, by its attorney, Michael J. Garcia, United States Attorney for the Southern District of New York, pursuant to Rule 34 of the Federal Rules of Civil Procedure, hereby requests that Guillermo Concepcion, claimant herein, produce for inspection and copying the following designated documents at the Office of the United States Attorney, One St. Andrew's Plaza, New York, New York, within thirty days of this date.

1. All documents which you intend to offer into evidence at trial if this action goes to trial.

2. All documents reflecting, stating and relating in whole or in part to any ownership interest you claim in the Vehicle and the Defendant Funds.

3. All documents in your possession reflecting, stating or relating in whole or in part to any interest that anyone else claims in the Vehicle and the Defendant Funds.

4. Your federal, state, local, and foreign income tax returns with all attachments, including W-2 forms, since 2000.

5. The executed and notarized Authorization to Release Employment Information and Reports (attached hereto).

6. The executed and notarized Authorization to Release Financial Records and Documents (attached hereto).

7. All documents relating to every conveyance,

including vehicles, boats and aircraft, in which you have or had any interest, in whole or in part, for the years 2000 through the present.

8. All documents relating to every residence in which you have or had any interest, in whole or in part, for the years 2000 through the present.

9. All account records for your loan mortgages, investments, and bank accounts, including but not limited to IRA's, money market accounts, savings accounts, stocks, bonds, precious metals, trusts and investments of any other type, including investments in businesses, savings accounts and any other financial indebtedness or investments since 2000.

Dated: New York, New York
January 9, 2008

MICHAEL J. GARCIA
United States Attorney
Attorney for the Plaintiff
United States of America

By: /s/
ANNA E. ARREOLA
Assistant United States Attorney
One St. Andrew's Plaza
New York, New York 10007
Tel. No.: (212) 637-2218

AUTHORIZATION TO RELEASE
FINANCIAL RECORDS AND DOCUMENTS

TO WHOM IT MAY CONCERN:

I hereby agree and consent that all records and files within your custody or control which in any way pertain to me, including but not limited to, bank statements, canceled checks, deposit and withdrawal slips, records of savings accounts and charge accounts, safe deposit box rent receipts, record of entry to safety deposit boxes, credit applications, credit reports and all other information as may be included in said records and files, be released by you to a representative of the United States Attorney's Office for the Southern District of New York upon the receipt of this authorization or a copy hereof.

Signature

Social Security Number

Address (Street/P.O. Box)

(City, State, Zip Code)

City/County of _____

State of _____

Sworn to and subscribed before me
this day of , 2008.

Notary Public

My commission expires: _____

AUTHORIZATION TO RELEASE
EMPLOYMENT INFORMATION AND REPORTS

TO WHOM IT MAY CONCERN:

I hereby agree and consent that all employment records and files within your custody or control pertaining to me, including but not limited to, applications, files, pay statements, personnel ratings and records, dates of employment and leave, and all other information as may be included in said records and files, be released by you to a representative of the United States Attorney's Office for the Southern District of New York upon the receipt of this authorization or a copy hereof.

Date

Signature

Social Security Number

Address (Street/P.O. Box)

(City, State, Zip Code)

City/County of _____

State of _____

Sworn to and subscribed before me
this day of , 2008.

Notary Public

My commission expires: _____